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9 Attorneys for Plaintiff
10 CAMERON HARRELL

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 CAMERON HARRELL,

14 Plaintiff,

15 vs.

16 RICHARD O. REED POST, NO. 777,
17 THE AMERICAN LEGION,
18 DEPARTMENT OF CALIFORNIA; and
19 DOES 1 to 10,

20 Defendants.

21 **Case No.: 5:24-cv-01446-SSS-DTBx**

22 **Request for Entry of Default (as to
23 Defendant RICHARD O. REED POST,
24 NO. 777, THE AMERICAN LEGION,
25 DEPARTMENT OF CALIFORNIA)**

26 TO: THE CLERK OF THE ABOVE-ENTITLED COURT

27 Plaintiff CAMERON HARRELL hereby requests that the Clerk of the above-
28 entitled Court enter default in this matter against Defendant RICHARD O. REED POST,
("Defendant") on the ground that said Defendant has failed to appear or otherwise
respond to the Complaint within the time prescribed by the Federal Rules of Civil
Procedure. Plaintiff served the Complaint on Defendant as evidenced by the proof of
service of summons on file.

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1 Dated: August 26, 2024

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3 **SO. CAL. EQUAL ACCESS GROUP**

4 By: /s/ Jason J. Kim
5 Jason J. Kim, Esq.
Attorneys for Plaintiff

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11 CAMERON HARRELL

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA**

14 CAMERON HARRELL,

15 Plaintiff,

16 vs.

17 RICHARD O. REED POST, NO. 777,
18 THE AMERICAN LEGION,
19 DEPARTMENT OF CALIFORNIA; and
20 DOES 1 to 10,

21 Defendants.

22 **Case No.: 5:24-cv-01446-SSS-DTBx**

23 **Declaration of Jason J. Kim re: Request
for Entry of Default (as to Defendant
RICHARD O. REED POST, NO. 777,
THE AMERICAN LEGION,
DEPARTMENT OF CALIFORNIA)**

24 1. I, the undersigned, am an attorney licensed to practice law by the State Bar
25 of California and admitted to the Central District of California. I am the attorney of
26 record for the Plaintiff CAMERON HARRELL (“Plaintiff”) and, in that capacity, I am
27 familiar with this matter.

28 2. Federal Rule of Civil Procedure Rule 55(a) provides that “[w]hen a party
against whom a judgment for affirmative relief is sought has failed to plead or otherwise
defend, and that failure is shown by affidavit or otherwise, the clerk must enter the
party’s default.”

1 3. We have received no answer or other responsive pleading to the Complaint
2 that was served on Defendant RICHARD O. REED POST, NO. 777, THE AMERICAN
3 LEGION, DEPARTMENT OF CALIFORNIA.

4 I declare under penalty of perjury under the laws of the State of California that the
5 foregoing is true and correct.

6
7 Dated: August 26, 2024

SO. CAL. EQUAL ACCESS GROUP

8
9 By: /s/ Jason J. Kim
10 Jason J. Kim, Esq.
11 Attorneys for Plaintiff

1 PROOF OF SERVICE
2

3 I, Mike Jun, am a resident of the United States and of the county aforesaid; I am over the age of eighteen years and not
4 a party to the within entitled action; my address is
5

6 101 S. Western Avenue
7 Second Floor
8 Los Angeles, California 90004
9

10 On August 26, 2024, I served the foregoing document by placing the true copies thereof enclosed in sealed envelopes
11 addressed as follows:

12 RICHARD O. REED POST, NO. 777,
13 THE AMERICAN LEGION, DEPARTMENT OF CALIFORNIA
14 c/o Celeste Williams, As Agent for Service
15 194 40th St.
16 San Bernadino, CA 92404
17

18 DOCUMENT(S): Request for Entry of Default (as to Defendant RICHARD O. REED POST, NO. 777, THE
19 AMERICAN LEGION, DEPARTMENT OF CALIFORNIA); Declaration of Jason J. Kim Re: Request for
20 Entry of Default (as to Defendant RICHARD O. REED POST, NO. 777, THE AMERICAN LEGION,
21 DEPARTMENT OF CALIFORNIA)

- 22 (X) BY U.S. POSTAL MAIL: I am "readily familiar" with the firm's practice of collection and processing
23 correspondence and processing correspondence for mailing. Under that practice it would be deposited with the
24 U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the
ordinary course of business.
- 25 () BY PERSONAL SERVICE: I delivered a true copy of the foregoing document(s) in a sealed envelope by hand
26 to the above addressee(s).
- 27 () BY FACSIMILE: I caused said document(s) to be transmitted by facsimile to the address(es) set forth above
28 during normal business hours. Said transmission was verified as complete and without error.
- 29 () BY OVERNIGHT DELIVERY / FEDEX EXPRESS: I caused said envelope(s) to be sent overnight delivery
30 by FedEx Express to the address(es) set forth above.
- 31 () ONLY BY ELECTRONIC TRANSMISSION: Only by e-mailing the document(s) to the persons at the e-mail
32 address(es) listed. This is necessitated during the Coronavirus (Covid-19) pandemic because this office may be
33 working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No
34 electronic message or other indication that the transmission was unsuccessful was received within a reasonable
35 time after the transmission.

36 I declare under penalty of perjury, under the laws of the State of California, that the foregoing is
37 true and correct.

38 Executed on August 26, 2024, at Los Angeles, California.

